

15 writing these orders, to the level we had anticipated.

16 Q. So your service reps were less productive than
17 you had anticipated?

18 A. Yes.

19 Q. Why was that?

20 A. Part of it was their experience level in a live
21 environment because we had trained them earlier in the
22 year, but we didn't have actual volumes to deal with. And
23 part of it was the amount of reprocessing work that was
24 required in order to get to the point where we had an
25 accurate service request to process.

0090

1 Q. So as I understand your testimony, their
2 training was not sufficient so that they could perform at
3 the level of productivity that was expected -- estimated?

4 A. No, I didn't say that. I said that, based on
5 the training we gave them and their lack of experience,
6 they were not as productive. There was a learning curve
7 that you get involved in, in any new process, and they
8 were on that learning curve.

9 Q. With 20-20 hindsight, would you have provided
10 them with more training or different training?

11 A. I believe that -- well, I believe that the
12 initial training that we took them through, which is seven
13 to eight weeks of training, was appropriate and necessary
14 and met that initial demand. I believe that there are
15 certain parts of the process where, knowing what I know
16 now, hindsight as you say, or knowing what I knew then,

17 that we probably needed more remedial training than we had
18 in place.

19 Q. How about the systems that Pacific had in the
20 LISC? Was that one of the reasons for the -- for not
21 being able to meet the demand?

22 A. No, I don't believe that was a major factor.
23 The process, the way it's designed, is the service request
24 that comes in, whether it comes in on a paper format or
25 electronically, still requires the initiation of a sort of
0091
1 order input, a Service Order Retrieval and Distribution,
2 SORD.

3 We anticipated that input in sizing our force.
4 I believe that the systems that we had expected to have up
5 at that point in time, and this is this crossover point we
6 are talking about, I think were what we had assumed we
7 would have.

8 Q. Were you responsible for the training of the
9 employees in the LISC?

10 A. The actual training is done by a different
11 organization, not mine.

12 Q. But do you have input into what goes into the
13 training?

14 A. Yes, the operational people, we have input into
15 that.

16 Q. So the training people -- I mean, how does it
17 work? You say I am going to need so many new employees?

18 A. Right.

19 Q. Let's take this kind of step-by-step. You
20 decide you need a hundred new employees, let's say. At
21 some point, you made that decision, I think we talked
22 about that before. Sometime in October, you felt maybe
23 you needed a hundred new employees, remember?

24 A. Yes. It was actually November, I believe is
25 what I said.

0092

1 Q. Okay. Whenever it was. You decided you needed
2 a hundred employees, so first thing you need to do is get
3 authority to hire a hundred employees to place in the
4 LISC, right?

5 A. I had the authority to hire that. I wasn't
6 restricted from doing.

7 Q. You had that authority, okay. So you could do
8 that on your own signature, I assume?

9 A. Yes.

10 Q. So I presume, if Pacific is like any large
11 corporation -- all I know about Pacific is what I read in
12 the Diebert comments, but --

13 MR. KOLTO-WININGER: Objection. Move to strike.

14 MR. ETTINGER: Q. -- I assume there is some
15 paperwork in hiring employees, you can't just go out and
16 do it, right?

17 A. That's true.

18 Q. So you have to fill out the paperwork, I think
19 you called them a requisition?

20 A. Requisitions, right.

21 Q. You fill out those requisitions and they go

22 where, do you know?

23 A. They would go through our human resource staff,

24 as part of our business unit staff, part of our industry

25 markets group.

0093

1 Q. Within that you have a human resources?

2 A. Yes. And they would process that requisition to

3 our employment people.

4 Q. Okay. And these hundred employees might be

5 people, either new hires or transfers, from within

6 Pacific, correct?

7 A. They could be either, yes.

8 Q. It goes over to the employment group, and they

9 proceed to find human beings to match the job openings?

10 A. That's correct.

11 Q. And these new hires or transfers from other

12 places, other jobs in Pacific, are then matched with a job

13 opening, correct?

14 A. That's correct.

15 Q. And where do they go from there, the first place

16 they go to, some sort of training program?

17 A. Possibly, but not in all cases. Obviously, you

18 have to have training starting up at the point in time

19 that people are in need of that training. In some cases,

20 they may actually report to the job first, spend some

21 period of time, a short period of time on the job and then

22 go into a training class, because we stagger the start

23 dates of the training classes.

24 Q. They should be put on the job without some

25 training, get some on-the-job training first, until a
0094

1 class opens up?

2 A. In the case of the LISC, the initial people that

3 were brought in were brought into the work environment.

4 There wasn't any work at that time, per se. Live orders,

5 the people on the resale side, were slotted for basic

6 sales rep training.

7 If I can recall correctly, the majority of those

8 people were current employees of Pacific Bell but not

9 necessarily experienced service representatives, so they

10 required the service representative training. They were

11 put into that process, while they were working through

12 that initial training, plus additional training for resale

13 order process, specific to the resale order process. They

14 also were in and out of the job location and were actually

15 working on setting up the work environment, et cetera.

16 Q. What you just told me was about the initial

17 group, right?

18 A. Right.

19 Q. I want to ask you about that November time

20 frame, when you were adding the hundred employees.

21 A. All right.

22 Q. These hundred employees didn't come all in one

23 day; they came in over time, correct?

24 A. That's correct.

25 Q. And I assume the training would vary, depending
0095

1 on whether they were a new hire, for example, or an
2 existing employee?

3 A. That's true.

4 Q. By and large, new hires needed new training; is
5 that fair?

6 A. Usually, but if you had an existing employee
7 that had no background in this particular work area, they
8 may require the same amount of training as a new employee
9 would, typing orders and that sort of thing.

10 Q. Do you have a particular training class that was
11 devoted just to the LISC, or was it -- did they get
12 trained along with other employees in other job functions?

13 A. Are you referring to the requisition that we put
14 out in the November, December time frame, specifically?

15 Q. Yes, I am asking about that time frame now.

16 A. I am not sure how they were intermingled in the
17 training classes. I don't have direct knowledge of makeup
18 of the training class.

19 Q. I guess I am asking, was there something called
20 the LISC training class?

21 MR. KOLTO-WININGER: That you are aware of.

22 THE WITNESS: Oh, not that I am aware of. The
23 initial training that they receive is not unique to the

24 LISC. It's around all of the systems, around the order
25 formats, et cetera, that are required to interface with
0096

1 the systems. Then there's an additional piece of training

2 that's unique to the resale process in the LISC.

3 MR. ETTINGER: Q. As I understand, there is two
4 phases of training; one, training that's not unique to the
5 LISC?

6 A. Yes.

7 Q. And I think you referred to earlier as the
8 service representative training, and that's where you
9 learn about the various systems that you have to interface
10 with?

11 A. Yes.

12 Q. How long is that training class, do you know?

13 A. Initial training can -- I believe it can be up
14 to seven weeks.

15 Q. To seven weeks. A person like me, who doesn't
16 know anything about it, would take at least seven weeks?

17 A. Maybe longer.

18 Q. Well, I don't type well. We assume lawyers take
19 longer than everybody else.

20 A. You can assume it would take the full complement
21 of time of training.

22 Q. Then, when an individual has completed that, and
23 we are talking about however long it takes, then there is
24 a second sort of training that has to do with what you
25 call resale training?

0097

1 A. Yes.

2 Q. And isn't that unique to the LISC, the resale
3 training?

4 A. That training is specific to the uniqueness
5 about the resale type of orders that they need to know
6 about.

7 Q. So the answer is yes?

8 A. Yes.

9 Q. How long is that training?

10 A. Generally, it's an additional week of training.

11 Q. And that doesn't -- does that take place at the
12 LISC or someplace else?

13 A. It would take place someplace else.

14 Q. In the training class?

15 A. Yes.

16 Q. And were there any times that either of these
17 two training courses that you had employees ready to go
18 but you couldn't -- there were no openings?

19 A. I am not aware of that specifically.

20 Q. Do you know who would be?

21 A. The people in the operating environment.

22 Q. But --

23 A. The managers of the LISC would know that.

24 Q. So if Ann Long was being deposed she might --
25 she'd be probably the best person?

0098

1 A. Yes.

2 Q. And then, once the individual comes out of those
3 two training courses, they go into the LISC, right?

4 A. Yes.

5 Q. Although I think you told me if they had to wait

6 or something to get into a training course, they might be
7 in the LISC even before their training was complete?

8 A. You would give them tasks that they were capable
9 of performing without the service rep training to do.

10 Q. If they completed the service rep training and
11 hadn't completed the resale training and were waiting for
12 that, then you'd give them, perhaps, more complex tasks?

13 A. That could be a potential combination.

14 Q. Now, let's assume the person has completed all
15 the formal training; what happens to that person, they
16 come into the LISC that next morning and you give them an
17 assignment?

18 A. They'd be assigned, yes, they'd be assigned to
19 the work group.

20 Q. And is there any ongoing training for people
21 once they are assigned to the work group after they've
22 completed these two formal training? Do they have any
23 sort of training that you take people in through the LISC?

24 A. There is a number of different things that do
25 occur in the process. I am probably not the best person
0099

1 to answer that in specific terms.

2 In general terms, I can tell you there is
3 coaching by their managers, there's feedback on their
4 order writing, there are job aides that are communicated
5 to them. There is a number of -- a variety of different
6 tools are used to do reinforcement training.

7 Q. I think I asked you before, but you have a

8 budget, right, that you operate under, correct?

9 A. Yes.

10 Q. And when you send people out for training, you

11 get charged -- does your budget get charged by the

12 training group, so many dollars?

13 A. Yes, it does.

14 Q. Like a cross-charge?

15 A. Yes, it does.

16 Q. I don't know if this is -- I won't ask you the

17 actual number, but can you tell me whether you were over

18 or under budget for training in 1996?

19 A. We were over budget on our '96 portion for

20 training as well as overall labor expense.

21 Q. Can you tell me by what percentage?

22 A. I don't want to divulge that.

23 MR. KOLTO-WININGER: Is it proprietary?

24 THE WITNESS: Well --

25 MR. ETTINGER: Counsel, maybe you want to
0100

1 consult with the witness, since I don't know what the

2 budget is if he tells me the percentages.

3 MR. KOLTO-WININGER: Do you want to talk about

4 it off the record?

5 MR. ETTINGER: Sure. Let's go off the record.

6 (Discussion off the record.)

7 MR. ETTINGER: Q. We were talking about factors

8 that led up to the questions on the training, factors that

9 went into the LISC running into a backlog condition back

10 in the November time frame, and one of the things you

11 mentioned was systems. Do you recall that?

12 A. Uhm-hum, yes.

13 Q. And as I take it, that the systems were being

14 improved on in that time frame; is that fair to say?

15 A. We were -- during that November, December time

16 frame, we were assessing our systems, designing our

17 platform -- I am talking about what the service rep was

18 using when I refer to a platform, and looking for ways of

19 improving the capacity to move work through those systems.

20 The plan that we developed out of that took us into

21 January and beyond.

22 Q. I am wondering why the systems couldn't have

23 been worked on earlier than November. Why did Pacific

24 wait until it reached a backlog stage before it started to

25 do work to improve on its systems?

0101

1 A. I am not responsible for the systems plan

2 itself, so I don't feel I am qualified to answer that

3 specifically.

4 Q. You are responsible for the LISC, correct?

5 A. Yes.

6 Q. And if there is a backlog or errors in the LISC,

7 it's your responsibility, correct?

8 A. Yes.

9 Q. So I would think, then, that as the chief

10 executive responsible for the LISC, you would want to

11 ensure that the systems used by the people in the LISC

12 were adequate; is that correct?

13 A. That's true.

14 Q. What did you do to ensure yourself that the
15 systems you had were adequate?

16 A. The systems plans that were developed, in being
17 developed once the FCC order came out, define all of the
18 earliest products that were going to be included on the
19 resale. Prior to us receiving any order, input of any
20 magnitude seemed to be sufficient to move us through '96
21 into '97. Our judgment was that we could get enough
22 productivity and volume through process in the systems
23 based on the assumptions that were being made.

24 As I stated earlier, we could not achieve the
25 level of productivity that we had based the force plan on,
0102
1 and therefore, we started to look for alternative ways of
2 improving productivity through advancing or developing
3 system enhancements.

4 Q. Was one of the reasons that the productivity was
5 not as good as forecast because the systems were not
6 adequate?

7 A. I believe that the assumptions that were being
8 made around productivity included many factors, not just
9 the systems. The force plan that we were working against
10 was assuming a certain amount of order types as versus a
11 specified type migration. It did not anticipate people
12 not utilizing electronic input to us and the heavy paper
13 mold that we found ourselves in, once we started to get

14 into what I would call more of a production environment

15 where the volumes justified that.

16 Q. When you talk about productivity, are you

17 talking just about capacity, or also about the accuracy of

18 what Pacific was doing?

19 A. When I refer to productivity, I talk about the

20 assumptions that were made as to how many orders a service

21 representative could process in a day. And it's an

22 aggregate figure because process doesn't all occur in one

23 step, it occurs in steps over time. But what's the

24 aggregate time for order -- to process that order, that's

25 what I refer to as productivity. That doesn't assume you
0103

1 have a good order to work with and so forth.

2 Q. We are talking about productivity. You

3 primarily focus there on the number of orders per day?

4 A. No. It was the amount of time. I think more

5 accurately, the amount of time, service rep time, that

6 would be required to process an order in totality.

7 Q. But another issue was the Firm Order Commitment

8 within four hours and doing that correctly?

9 A. Yes.

10 Q. In addition to the fact that -- let me ask you

11 this. Isn't it true that, during that same time frame,

12 the October, November, December time frame, Pacific was

13 not issuing Firm Order Commitments within four hours;

14 there was a problem with errors in the FOC's?

15 MR. KOLTO-WININGER: If you know.

16 THE WITNESS: I am not -- yeah, I don't have any
17 specific information about FOC quality. Is that what
18 you're referring to?

19 MR. ETTINGER: Q. Yes.

20 A. No, I am not personally aware of the specifics
21 around that.

22 Q. Do you know who would be?

23 A. Again, the people that were in the operation of
24 the LISC would have some knowledge of that.

25 Q. It would be Ann Long?
0104

1 A. That would be Ann Long, yes.

2 Q. You'd be able to say if there were problems with
3 accuracy or were not?

4 A. Yes.

5 Q. Now, sometime in January, your job functions
6 changed or were realigned?

7 A. Yes.

8 Q. I don't know what the best way to say that is.
9 And Mr. Stankey took over some of your job functions; is
10 that correct?

11 A. Yes.

12 Q. And you kept some and you took some others. I
13 want to try to -- was basically what happened, your job
14 got divided in two?

15 A. No. You mean half and half, no. We made a
16 decision -- actually, in the December time frame, we made
17 a decision that with the magnitude of the volumes and the

18 plans we were trying to implement, that we would be better
19 served if we had one person that was solely responsible
20 for the resale process. And at that time, the decision
21 was made to bring someone in, and it turned out that it
22 was John Stankey that we brought in to be the person
23 responsible for resale order processing.

24 Q. And --

25 A. Which was a piece of my job.

0105

1 Q. Right. And your new job, was that also from
2 your old job, or did you take in some new additional
3 responsibilities?

4 A. No. What I am currently responsible for is what
5 I was responsible for in 1996, less the resale piece of
6 that.

7 Q. So that your job was split?

8 A. Yeah, split, right.

9 MR. KOLTO-WININGER: Not in two.

10 THE WITNESS: Not in two is what I was saying.

11 My responsibilities are way beyond just the resale
12 wholesale environment.

13 MR. ETtinger: Q. You have other
14 responsibilities as well?

15 A. Yeah. It wasn't like -- right.

16 Q. What I am trying to understand, is, though, it
17 was recognized that the job was -- had grown beyond what
18 one person could reasonably handle?

19 A. We felt that it required, yeah, the kind of

20 attention for somebody to focus only on resale.

21 Q. And so you have now the facilities portion,
22 correct?

23 A. Uhm-hum, yes.

24 Q. What are your other current job
25 responsibilities?

0106

1 A. As I described in the beginning, I have
2 responsibility for customer service across all of the
3 access markets, interexchange carrier markets, the
4 competitive markets, the coin operated telephone markets,
5 the enhanced service provider market, the information
6 service provider markets, et cetera.

7 Q. Most of those other markets are more established
8 markets, correct?

9 A. Yes, they are.

10 Q. Though the facilities market that you have is
11 the last new market, right?

12 A. Relatively speaking, yes.

13 Q. In other words, you will be responsible for the
14 service center that handles unbundled network elements,
15 once we have them priced and for sale?

16 A. Yes.

17 Q. I think I understand that. Were you involved
18 with the decision to say, we ought to split out this
19 resale function and separate it out, it's growing so fast?

20 A. Yes, I was.

21 Q. Did you initiate that or how did that come

22 about?

23 A. It was sort of a series of discussions,
24 primarily between Liz Fetter and myself and other people
25 that had been involved in the process.

0107

1 Q. Prior to that time, where was Mr. Stankey in the
2 corporation?

3 A. John came from our broadband organization.

4 Q. And what was his job in the broadband. Was he
5 in charge of sales or marketing?

6 A. I don't know his specific job function. You'd
7 have to ask him.

8 Q. When did he take that function over from you?

9 A. I don't remember the exact date. It was in
10 January of this year.

11 Q. Was there an overlap period? Did you help train
12 him basically for that job and brief him on what the
13 issues were and discuss things with him?

14 A. Yes. We spent quite a bit of time working
15 together in the early weeks, and because we are in the
16 process of implementing contracts now, we just spent time
17 together because the contracts cover a variety of products
18 resale as we -- as unbundled networks elements.

19 Q. You are talking about the interconnection
20 agreements pursuant to the Communications Act negotiated
21 between Pacific and various other carriers?

22 A. Yes.

23 Q. Those contracts affect both of you, both the

24 resale and the facilities?

25 A. Yes.

0108

1 Q. Can you give me an estimate about how much time

2 you spent with Mr. Stankey going over problems and

3 training him in the January time frame?

4 A. I don't know. We were -- I don't know -- I

5 don't have, off the top of my head, an estimate of what

6 that time would be.

7 Q. Would it be fair to assume that it's kind of

8 decreased over time as he's become more familiar with his

9 new job?

10 A. From a day-to-day operations perspective,

11 certainly.

12 Q. You still have to discuss ongoing business

13 problems or new problems with him, but as far as the

14 existing issues that were in place in January, he is now

15 familiar with them?

16 A. Yes.

17 Q. Just a couple of more things that I want to

18 cover with you.

19 You testified, did you not, in the arbitration

20 matter between -- arbitration of the interconnection

21 agreement between AT&T and Pacific Bell?

22 A. Yes, I did.

23 Q. And that was -- when did that occur, do you

24 remember?

25 A. I don't know the dates of the hearings. I don't

0109

1 remember the dates of the hearings.

2 Q. But you prepared direct testimony?

3 A. Yes.

4 Q. I assume you worked with your attorneys in

5 preparing that?

6 A. Yes.

7 Q. Then you were subject to cross-examination, I

8 guess, on the testimony?

9 A. Yes.

10 Q. And you also prepared for that?

11 A. Yes.

12 Q. Did you also testify in any other

13 interconnection agreement case?

14 A. Yes, I did.

15 Q. Arbitrations, I should say?

16 A. Yes.

17 Q. What were they?

18 A. In the MCI arbitration hearings, I testified

19 there as well.

20 Q. Just those two?

21 A. Just those two.

22 Q. That was sometime after AT&T in the fall, was it

23 not?

24 A. Yes.

25 Q. MCI followed AT&T?

0110

1 A. Yes.

2 Q. When you were doing that, how were you able to

3 also perform your day-to-day job? Basically, did it take

4 up all your time while you were involved in it?

5 A. I spent a fair amount of time in the summer

6 months in participating in the arbitration hearings,

7 preparing the testimony for that. I had a group of people

8 working with me on that. But that was part of my

9 responsibilities.

10 Q. I mean, I assume if you were -- if your

11 preparation was anything like the AT&T people, you were

12 involved in very long days in preparing, were you not?

13 A. At times we were, yes.

14 Q. Were you also involved in, before the hearings,

15 involved in the actual arbitrations, not the arbitrations,

16 involved in the actual -- the negotiations?

17 A. Yes, I was.

18 Q. And similarly, that took a lot of time?

19 A. I don't know what your definition of a lot of

20 time is. Quite a bit of time on my part.

21 Q. Were you able, during the summer and fall, to

22 work 40-hour weeks, or were you working longer than that?

23 A. Generally, I work longer than 40-hour weeks,

24 yeah.

25 Q. 60-hour weeks?

0111

1 A. I don't keep track of my time that way, or

2 report time that way, so -- we were putting extensive time

3 and effort into all of this work, yes.

4 Q. What I'm trying to understand is, while that was

5 going on, and this was obviously necessary work, how were
6 you able to put in time into the planning for the LISC?

7 A. Well, there was quite a bit of organization
8 around me that also supported that process. I was not the
9 sole architect or planner for the LISC. As I explained, I
10 had an executive director, there were center managers,
11 there was a complete support staff that was doing much of
12 the process designed by support organization that provided
13 the process designs and the methods and procedures support
14 that. So there was a large contingent of people within
15 the industry markets group and within Pacific Bell
16 supporting the resale process and local competition.

17 Q. Were they also involved in the negotiations and
18 arbitrations?

19 MR. KOLTO-WININGER: All of them or some of
20 them?

21 MR. ETTINGER: Q. Were all of them involved?

22 A. No, all of them were not involved.

23 Q. So some?

24 A. Some were, yes.

25 Q. So some were able to devote their time to the
0112 ongoing operations?

2 A. That's right.

3 Q. Are you involved in any way -- both the AT&T
4 arbitrations and MCI have gone to appeal. Are you aware
5 of that?

6 A. Yes, I am aware that there is an appeal.

7 Q. Are you involved in the appeal in any way?

8 A. No, I am not.

9 MR. ETtinger: I think I have a series of
10 questions about the other issue in our complaint, which
11 deals with the disconnections, but I know we can't finish
12 that in 10 minutes, so I just as soon break now.

13 MR. KOLTO-WININGER: Sure.

14 MR. ETtinger: And we will continue with that
15 line of questioning, perhaps when the deposition resumes,
16 if that's agreeable.

17 MR. KOLTO-WININGER: Sure.

18 MR. ETtinger: Why don't we recess the
19 deposition now until -- do we want to agree on another
20 time for this, or should we go off the record?

21 MR. KOLTO-WININGER: Let's go off the record.

22 (Discussion off the record.)

23 (Whereupon, the proceedings were adjourned
24 at 4:20 p.m.)

25 -- o0o --

0113

1 CERTIFICATE OF WITNESS

2

3

4

5 I, the undersigned, declare under penalty of
6 perjury that I have read the foregoing transcript, and I
7 have made any corrections, additions, or deletions that I
8 was desirous of making; that the foregoing is a true and

9 correct transcript of my testimony contained therein.

10

11 EXECUTED this day of ,

12 19 , at , .

13

14

15 _____

16 JEROLD R. SINN

17

18

19

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23

24

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0114

1)

2 STATE OF CALIFORNIA) ss.

3)

4 I, SANDRA L. CARRANZA, the undersigned, a Certified

5 Shorthand Reporter of the State of California, hereby

6 certify that the witness in the foregoing deposition was

7 by me duly sworn to testify to the truth, the whole truth,

8 and nothing but the truth in the within-entitled cause;

9 that said deposition was taken at the time and place

10 therein stated; that the testimony of said witness was

11 reported by me, a Certified Shorthand Reporter, and a
12 disinterested person, and was thereafter transcribed under
13 my direction into typewriting; that the foregoing is a
14 full, complete, and true record of said testimony.

15 I further certify that I am not of counsel or
16 attorney for either or any of the parties in the foregoing
17 deposition and caption named, or in any way interested in
18 the outcome of the cause named in said caption.

19 IN WITNESS WHEREOF, I have hereunto set my hand this
20 day of , 1997.

21 _____
22 SANDRA L. CARRANZA
23 Certified Shorthand Reporter
24 Registered Professional Reporter

25
0115
1 CHAMBERLIN & ASSOCIATES
2 Certified Shorthand Reporters
3 Two Embarcadero Center, Suite 1710
4 San Francisco, California 94111

3/24/97

4
5 TO: JEROLD R. SINN
6 PILLSBURY, MADISON & SUTRO
7 c/o ED KOLTO-WININGER, ATTORNEY AT LAW
8 235 Montgomery Street
9 San Francisco, California 94104

RE: MCI TELECOMMUNICATIONS CORPORATION vs. PACIFIC
BELL AND PACIFIC BELL COMMUNICATIONS
Date of Deposition: March 17, 1997, Volume I
Reported By: SANDRA L. CARRANZA, CSR 7062

10 JEROLD R. SINN:

11 The original transcript of your deposition taken in
12 the above-entitled action has been prepared and is
available at this office for your reading, correcting, and

signing.

13

You may wish to discuss this matter with your
14 attorney to determine if counsel requires that the
original transcript of your deposition be read, corrected,
15 and signed by you before it is sealed.

16 Your rights regarding signature of this deposition
are contained in the California Code of Civil Procedure.

17

Unless otherwise directed, your original deposition
18 transcript will be sealed after 35 days from today's date.

19 If you wish to make arrangements to review the
original transcript of your deposition, please contact
20 this office during office hours, 9:00 to 5:00 Monday
through Friday, to make an appointment to review the
21 original transcript.

22

Sincerely,

23

SANDRA L. CARRANZA
Certified Shorthand Reporter
24 Registered Professional Reporter

25 cc: All Counsel

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